

Australian Code of Practice on Disinformation and Misinformation
Redbubble Limited
Annual Transparency Report
1 January 2021 - 31 December 2021

Summary

Redbubble is an artist marketplace dedicated to giving independent artists a meaningful way to sell their creations.

Whilst artistic freedom and inclusivity is a cornerstone of Redbubble's mission, Redbubble recognises the harm that arises from the spread of Misinformation and Disinformation. Redbubble strives to balance its fostering of artistic freedom with the need to prevent the spread of Misinformation and Disinformation.

Redbubble is committed to stopping the spread of Misinformation and Disinformation and this report details the measures that Redbubble takes in this area.

Central to our response to the spread of Misinformation and Disinformation is the publication and enforcement of the Redbubble Community and Content Guidelines which prohibit participants in the marketplace from uploading this type of content to our marketplace.

Under the Redbubble Community and Content Guidelines published on the Redbubble marketplace, Redbubble prohibits users from uploading Misinformation or Disinformation within the images that they upload to our marketplace. The Redbubble Content Safety Team applies the Community and Content Guidelines in an unbiased and consistent manner.

To this end, the Redbubble Content Safety team makes use of credible and trusted sources in determining the boundaries of Disinformation and Misinformation.

Commitments under the Code

Outcome 1a: Reducing harm by adopting scalable measures	Yes - Redbubble.com
Outcome 1b: Inform users about what content is targeted	Yes - Redbubble.com
Outcome 1c: Users can easily report offending content	Yes - Redbubble.com
Outcome 1d: Information about reported content available Etc. ...	Yes - Redbubble.com
Objective 2: Disrupt advertising and monetisation incentives for disinformation.	Yes - Redbubble.com
Objective 3: Work to ensure the integrity and security of services and products delivered by digital platforms.	Yes - Redbubble.com
Objective 4: Empower consumers to make better informed choices of digital content.	Opt out
Objective 5: Improve public awareness of the source of political advertising carried on digital platforms.	Opt out
Objective 6: Strengthen public understanding of Disinformation and Misinformation through support of strategic research.	Yes - Redbubble.com
Objective 7: Signatories will publicise the measures they take to combat Disinformation.	Yes - Redbubble.com

Reporting against commitments

Outcome 1a: Reducing harm by adopting scalable measures

Redbubble prohibits the uploading of Misinformation or Disinformation to the Redbubble marketplace, by application of the Community and Content Guidelines.

Examples of Misinformation and Disinformation that the Content Safety team proactively screens for include:

- **Medical Misinformation:**
 - Anti-vaccine propaganda: Measurably hurts public health by encouraging the spread of communicable disease;
 - Covid-specific Conspiracy Theories: theories that seek to de-legitimise scientifically factual information put forth by trustworthy sources such as the WHO and the CDC - and pose a threat to public health;
- **Denials of real-world catastrophes:**
 - Such as the Holocaust, 9/11 or the Sandy Hook shooting (and perpetrators and symbols of such content) which Redbubble considers causes further distress to victims and can be an incitement to violence
- **Political Misinformation:**
 - Harmful political conspiracy theories/movements linked to real-world harm
 - Platforms that perpetuate the spread of false misinformation.

The Redbubble Content Safety team makes use of credible and trusted sources in determining the boundaries of Disinformation and Misinformation, including review of independent fact checking sites. The Content Safety team compiles reference content to create review guidelines and gathers illustrative examples of borderline or grey area works.

The Redbubble Content Safety team provides Redbubble's Content Operations team with the review guidelines and additional training as appropriate to enable review of historical and incoming works for detection of potential Disinformation and/or Misinformation.

The Redbubble policies and decision-making processes are subject to on-going review to ensure their ongoing efficiency and effectiveness.

The Redbubble Content Safety Team also proactively screens the marketplace on a daily basis and removes content that it considers to include Disinformation or Misinformation related to known topics and issues. The Content Safety team determines screening keywords to enable live reviews, and queues existing works that match the search criteria.

Proactive screening measures include keyword ‘blacklisting’ that prevents content tagged with problematic terms and phrases from appearing on offsite marketing platforms where artists promote their products.

When the Content Safety Team makes decisions relating to content that potentially includes Misinformation or Disinformation, the team has regard to our Community and Content Guidelines, past decisions (to ensure consistency of approach and decision-making) and further research particularly in relation to new or emerging issues. This approach allows the team to strike the appropriate balance, both at the individual work level and at the larger topic level.

The Content Safety Team’s framework for content review is built on a robust repeatable and scalable process.

Outcome 1b: Inform users about what content is targeted

The communication to users of what constitutes Misinformation and Disinformation is critically important in stopping its spread. To this end, Redbubble publishes Community and Content Guidelines (**the Guidelines**) on the Redbubble.com website at <https://help.redbubble.com/hc/en-us/articles/202270929>.

The Guidelines set out Redbubble’s approach to behavior and content on our marketplace and are made public in the spirit of open communication with artists and their customers. The Guidelines are expressly noted to be adaptable and subject to refinement over time as the environment and circumstances change.

The relevant prohibition under the Community and Content Guidelines defines “Harmful Misinformation” in the following terms:

Harmful misinformation is not permitted. We define this as any misleading or false information that harms or significantly threatens public health and safety, or where the intent is to cause fear and suspicion about a topic that can cause real-world harm.

As foreshadowed in last year’s report, the current definition reflects changes during the year to generalise the prohibition to be more inclusive of different types of Misinformation and Disinformation.

Our User Agreement at <https://www.redbubble.com/agreement> provides further information to artists proposing to upload content to the marketplace. The User Agreement provides that an artist uploading content warrants, amongst other matters, that:

- the content does not contain material that is harmful, abusive, inflammatory or otherwise objectionable; and

- the content is not misleading and deceptive and does not offer or disseminate fraudulent schemes or promotions.

Outcome 1c: Users can easily report offending content

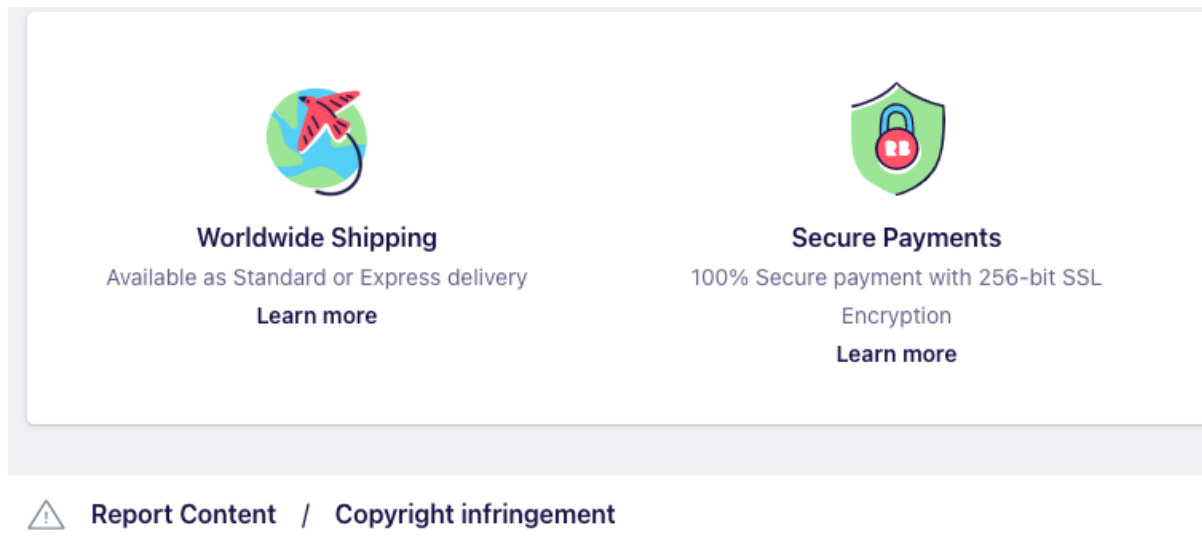
The Guidelines request that users flag behavior or content that contravenes the Guidelines, through one of the reporting functions on our site.

This is supported by the User Agreement on our website which asks that users:

Please help us by letting us know straight away about any inappropriate, or potentially inappropriate, content you see on the website. You can do this by clicking the "Inappropriate Content" link that will be displayed beside each piece of art.

As indicated in the User Agreement, Redbubble's users can report works and images they consider fall outside of Redbubble's content guidelines, including works that they consider contain Disinformation and/or Misinformation simply and easily.

In this regard, a prominent "Report Content" link is provided adjacent to each user-generated image that is published on the Redbubble marketplace:



The 'Report Content' link leads the user to the following online form where they can report the relevant content and provide information as to why they consider the content to be or include Misinformation or Disinformation (or otherwise objectionable):

Inappropriate Content

Note: **Your information will *not* be relayed to the author**, you will remain anonymous.

If you'd like to report ["image name"] by ["artist name"] as inappropriate, please complete this form and we'll make sure the review team takes a look.

Why are you reporting this content as inappropriate?

Please Select... ▼

If the content does not meet these guidelines, please provide any additional comments or information and click "send".

SEND

How does this work?

When you report a concern a notification is sent to the Redbubble objections team. We review the content and follow up in cases where the content falls outside Redbubble's guidelines. Due to the volume of emails the team receives, we cannot respond to every query regarding these reports but please rest assured we do check every single report carefully and we'll be in touch if we need any further information. If you would like more insight into the guidelines we apply, further information is available in our [community guidelines](#). Thanks again!

Outcome 1d: Information about reported content available

Redbubble has opted out of Objective 1d as Redbubble's current policy is that reporting is made on an anonymous basis. Possibilities for providing general information on Misinformation and Disinformation reports will be considered in the context of ESG Strategy and Action Plan developed during the course of the year.

In this regard, an important goal of our ESG Strategy is to empower and protect people who design, sell, make and use products from our marketplace. A key art of this goal is to ensure our marketplace is free from offensive, sexist, racist, hateful or otherwise objectionable content.

Objective 2: Disrupt advertising and monetisation incentives for disinformation.

Redbubble is a marketplace designed specifically for the artists who upload their artwork and design and sell products printed with their art. Redbubble considers that to allow third party advertising or other media placements could compromise its mission and purpose and be detrimental to the relationship between Redbubble and the artist community.

Accordingly, there is no third party advertising permitted to be published on Redbubble and media space is not sold to any third party businesses or organisations.

However, we recognise that this position does not completely eliminate the risk of monetisation incentives for Disinformation. To this end, Redbubble reduces monetisation incentives from artist sales of products on the Redbubble marketplace by swiftly removing any content that contains Disinformation and/or Misinformation, using the proactive and reactive processes described in this report.

A key tool in reducing the risk of monetisation incentives is “Suspend for Review” functionality through which designs identified as potentially Disinformation and/or Misinformation by Redbubble’s review systems are automatically suspended from view and are not visible to users until the Redbubble Content team reviews the relevant content. This prevents any monetisation in the time period between the time of upload of the design and review and clearance by the Content Safety team.

If a Redbubble user is found to be purposefully breaching the Community and Content Guidelines in the spread of Misinformation and/or Disinformation, then Redbubble will delete that user account (and any linked accounts of the user in breach).

Redbubble also applies restrictions on products sold by artists over the marketplace in relation to images that are considered borderline problematic.

Objective 3: Work to ensure the integrity and security of services and products delivered by digital platforms.

Redbubble uses third party fraud detection software called “Sift Science” that combines a global network of data and machine learning to automatically block risky users. Data points used by Sift Science are customised to Redbubble’s needs and allow room for adjustments based on emergent trends.

While Sift Science is mainly used as a fraud detection tool, it has been instrumental in maintaining content integrity on Redbubble and blocking risky users who tend to upload trending content that perpetuates Misinformation and/or Disinformation.

These users tend to hop on harmful topics that are trending in American media such as the anti-mask movement. In 2021, this software proactively suspended accounts with known connections to malicious or abusive accounts.

Objective 4: Empower consumers to make better informed choices of digital content.

Redbubble has opted out of Objective 4. The Redbubble marketplace is designed as a platform for independent artists to sell products printed with their art. There is no part of the Redbubble website that provides a channel for news or factual content.

Objective 5: Improve public awareness of the source of political advertising carried on digital platforms.

Redbubble has opted out of Objective 5. The reason for this is that it is not considered to apply to the Redbubble business.

In this regard, publication of third party advertising is not permitted on Redbubble. This includes advertising from any political party or body. In addition, Redbubble does not sell media space to any third party businesses or organisations.

This is because Redbubble is a marketplace designed for artists to upload their artwork and sell products printed with their art, and Redbubble considers that to allow third party advertising or other media placements could be detrimental to the relationship between Redbubble and the artist community and compromise our mission and purpose.

Objective 6: Strengthen public understanding of Disinformation and Misinformation through support of strategic research.

In principle Redbubble is open to supporting independent research that has the purpose of improving public understanding of Disinformation and Misinformation. Redbubble does not currently provide financial support to strategic research.

Objective 7: Signatories will publicise the measures they take to combat Disinformation.

This report will be made available on Redbubble's corporate website at shareholders.redbubble.com.

In addition to publication of this report, Redbubble will communicate its work against Misinformation and Disinformation in its Annual Report to Shareholders to be released in August 2022. This report is released to the ASX and provided to our excess of 8,000 shareholders.

Concluding remarks

To address the challenge of Misinformation and Disinformation, Redbubble will in the current year review its Community and Content Guideline and User Agreement to ensure they remain fit for purpose.

In addition, it is intended to further test treatment of Misinformation and Disinformation risk and the harm it can cause in the context of Redbubble's formal risk assessment processes ensuring

that current controls are in place and sound and to consider any further controls that may be appropriate.

Appendix

Business and Content Context

Redbubble Limited was founded in 2006. Redbubble owns and operates leading global online marketplaces hosted at Redbubble (redbubble.com) and TeePublic (teepublic.com). The Redbubble marketplaces are driven by the user-generated content of artists who sell high-quality products printed with their designs, such as apparel, stationery, housewares, bags, wall art and facemasks. Through the marketplaces, these independent artists are able to monetise their creativity and reach customers worldwide.

Approximately 7% of gross transaction value generated by our marketplaces is from Australia/New Zealand with 69% generated in North America, 13% in the EU and 10% in the UK.

Approach to Disinformation and Misinformation

Artistic freedom and inclusivity is a cornerstone of Redbubble's mission. However, Redbubble recognises that harm that arises from the spread of Misinformation and Disinformation. Accordingly, Redbubble strives to reach an appropriate balance between fostering artistic freedom and creativity with the need to prevent the spread of Misinformation and Disinformation.

Under the Redbubble Community and Content Guidelines published in the Redbubble website, Redbubble prohibits Misinformation or Disinformation within the images that users upload to the Redbubble marketplace. Under the User Agreement applicable to all marketplace users, artists uploading content warrant that the products they sell are free from Misinformation and Disinformation and Redbubble reserves the right to review and in its sole discretion remove any such content from the website and/or terminate the artist's account.

The Redbubble Content Management Team applies the Community and Content Guidelines in an unbiased and consistent manner.